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PACIFIC  TELESIS.
Group - Washington

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

February 24, 1993

**Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554**

Dear Ms. Searcy:

Re: CC Docket No. 92-237

On behalf of Pacific Telesis Group please find enclosed an original and six copies of its "Reply Comments" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Enclosures

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FEB 24 1993

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Administration of the) CC Docket No. 92-237
North American Numbering Plan) Phase I
)
_____)

REPLY COMMENTS OF PACIFIC TELESIS GROUP

Pacific Telesis Group, PacTel Corporation, Pacific Bell and Nevada Bell (hereinafter the "Pacific Companies") file these reply comments regarding the administration of the North American Numbering Plan. This phase of the proceeding deals with the choice of administrator of the North American Numbering Plan.

Industry Advisory Council

The comments filed in this proceeding form a consensus around establishing an industry advisory council to oversee the North American Numbering Plan ("NANP").¹ The industry advisory council should be charged with developing guidelines and standards for the assignment of numbers, as well as planning for future numbering needs. Commentors differed about whether Bellcore as the NANP administrator should continue to perform the ministerial function of number assignment, or whether that function should be transferred to a neutral third party. The Pacific Companies believe that, with the addition of an industry advisory council setting policy for numbering needs, the

¹ See, e.g., BellSouth Comments, p. 3; Telecor Comments, pp. 2-3; Canadian Steering Committee on Numbering Comments, p. 2; Bellcore Comments, p. 8.

ministerial duties can continue to be performed by Bellcore without adverse effect on the industry.

A second issue which has arisen is whether the industry advisory council should handle both policy and technical issues relating to numbering. While most commentators focused on the policy issues that are inherent in number assignment, the Pacific Companies believe that both policy and technical issues should be addressed by this council. In many instances, it is very difficult to separate the policy from the technical issues. Thus, if the industry advisory council has responsibility for both issues, it can determine what portions of an issue it is in the best position to decide, and it has the option of assigning the technical portion to another existing standards committee or other group working technical issues.

A numbering forum could be used to help the industry advisory council set policy and technical requirements. The forum should be structured as one large numbering forum (analogous to ICCF), with subcommittees structured as necessary to work various issues that arise. Those subcommittees can make recommendations to the numbering forum, which will then adopt recommendations utilizing the consensus model. As the Pacific Companies stated in their comments, this will ensure industry agreement about numbering issues.

In the Pacific Companies' comments, we suggested that the council be composed of a member representing each of the following industry groups: local exchange carriers, interexchange carriers, information service providers,

competitive access providers, and wireless carriers. However, ongoing changes in the structure of the telecommunications industry (i.e., evolution of new telecommunication providers and network alternatives, alliances of cross-industry players, etc.), blur the lines between these industry groups. Allocating seats on a council by industry segments may provide an expediency for formation, but may not provide a long-term solution.

The Commission must examine how an industry advisory council can be convened that truly represents an evolving industry and does not unfairly allow a patronage by established and newly allied entities. One option is to convene an industry meeting for the purpose of establishing the principles and standards of conduct for an advisory council that represents all interests.

Personal Communication Services (PCS)

A basic objective of non-geographic numbering resources dedicated to PCS should be a speedy transition to number portability across service providers. PCS number portability will enhance the value of PCS by promoting a more competitive environment by allowing a multiple number of service providers to offer PCS and permitting customers to change providers without changing numbers. Number portability for PCS is also the best way to ensure an efficient allocation of limited NANP resources since multiple service providers will share the same pool of numbering resources.

In order to facilitate the implementation of PCS to best serve the public interest, the Pacific Companies recommend that the Commission require PCS number portability across service providers as soon as feasible. This portability will ease the transition to PCS by making it easier for customers to utilize new services and encourage new providers to enter the PCS market.

The Commission must carefully consider the impact of any PCS numbering plan which would result in major switch modifications or a change in the dialing plan. The Pacific Companies recommend that the Commission mandate both home-based and country-based PCS numbering. The Pacific Companies have opposed efforts to either mandate or encourage use of a prefix plan (extending the 10 digit North American Numbering Plan) for universal personal telecommunication numbering. The Pacific Companies believe that a prefix plan would carry unnecessary customer confusion by requiring extra digits to be dialed by customers. In addition, it would force exchange carriers to make costly hardware and software changes to their network to accommodate the additional digits. These costs for network changes would ultimately be borne by customers, without demonstrable benefit to offset those costs.


Local Number Portability

In its comments, the Pacific Companies described their interpretation of local number portability as portability among service providers within a geographic area no larger than an

NPA. The comments filed reflected a variety of interpretations as to what constitutes local number portability.² As many commentators observed, local number portability will require extensive system and operational changes, at great cost.³ Before the Commission delves more deeply into the issues, a uniform definition of local number portability needs to be developed so that all parties can clearly address the issues.

Respectfully submitted,

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Date: February 23, 1993

² See, e.g., Illinois Commission Comments, p. 7 (portability between technologies); North Pittsburg Comments, p. 4 (NPAs portable around the country); GTE Comments, p. 18 (all numbers must be non-switch associated); US WEST Comments, p. 3 (multiple definitions for local portability); Bell Canada Comments, p. 5 (ubiquitous ability to change service provider and physical location).

³ See, e.g., Sprint Comments, p. 9; Pagenet Comments, p. 10; North Pittsburg Comments, p. 3; GTE Comments, p. 19; Bell Canada Comments, p. 6.

CERTIFICATE OF SERVICE

I, Alex Kositsky, certify that the following is true and correct:

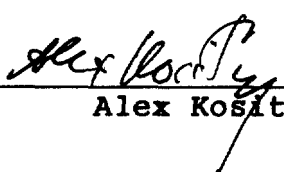
I am a citizen of the United States, State of California and over eighteen years of age.

My business address is 140 New Montgomery Street, San Francisco, CA 94105.

On February 24, 1993, I served the attached "Pacific Telesis' Reply Comments on Phase I, Notice of Inquiry in the Matter of the North American Numbering Plan - CC Docket No. 92-237" by placing true copies thereof in envelopes addressed to the parties in the attached list, which envelopes, with postage thereon fully prepaid, I then sealed and deposited in a mailbox regularly maintained by the United States Government in the City and County of San Francisco, State of California.

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By: _____


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